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**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

OMAR ARNOLDO RIVERA MARTINEZ;
ISAAC ANTONIO LOPEZ CASTILLO; JOSUE
VLADIMIR CORTEZ DIAZ; JOSUE MATEO
LEMUS CAMPOS; MARVIN JOSUE GRANDE
RODRIGUEZ; ALEXANDER ANTONIO
BURGOS MEJIA; LUIS PEÑA GARCIA;
JULIO CESAR BARAHONA CORNEJO, as
individuals,

PLAINTIFFS,

v.

THE GEO GROUP, Inc., a Florida
corporation; the CITY OF ADELANTO, a
municipal entity; GEO LIEUTENANT
DURAN, sued in her individual capacity;
GEO LIEUTENANT DIAZ, sued in her
individual capacity; GEO SERGEANT
CAMPOS, sued in his individual capacity;
SARAH JONES, sued in her individual capacity;
THE UNITED STATES OF AMERICA; and
DOES 1-10, individuals;

DEFENDANTS.

Case No.: 5:18-cv-01125-R-GJS

**DECLARATION OF PLAINTIFF
ISAAC ANTONIO LOPEZ
CASTILLO**

*Filed concurrently with Plaintiffs'
Opposition to Defendants The Geo
Group and City of Adelanto Motion for
Summary Judgment*

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Declaration of Isaac Antonio Lopez Castillo

I, ISAAC ANTONIO LOPEZ CASTILLO, declare as follows:

1. I have personal knowledge of the facts stated below and could testify competently to these facts if I were asked to testify as a witness.

2. From May 2017 to approximately August 2017, I was detained in ICE Custody at the Adelanto Detention Center in the City of Adelanto, California.

3. During my time at the Adelanto facility, I resided in various dorms, including dorms that were in the East facility and the West facility. I had access to and used the shower facilities in each of these dorms.

4. To turn on the shower in each of these dorms, I would have to press a button on the shower wall and water would spray from the showerhead. I did not have the ability to change the water temperature to a hotter or colder temperature. The water temperature in the showers was always extremely hot.

5. Following the incident on June 12, 2017, I was taken to an area that I understood was the intake area. I knew this was called the intake area because this area had holding cells that detainees were usually kept in before being transported within the facility. To my knowledge, there are two showers in the intake area. Based on my experience of being taken to the showers at the intake area, the water temperature there was extremely hot, just as it was in the other dorms.

6. After the incident on June 12, 2017, I continued calling individuals that were on my approved call list, including my attorney, advocates from immigrants' rights groups, and my friends and family. When I called individuals from immigrants' rights group, I reported the way GEO officers harmed me during the June 12, 2017 incident and informed them of the injuries I suffered. Individuals from the immigrants' rights group took down statements to help advocate for me and encouraged me to file grievances regarding the GEO officers. However, approximately one week later, their numbers began to be blocked.

1 I declare under penalty of perjury under the laws of the State of California
2 and the United States of America that the foregoing is true and correct.
3 Executed this 26th day of November 2019, in Tijuana, B.C., Mexico.
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